

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

Boots Smith Oilfield Services,)
LLC,)

Plaintiff,)

vs.)

Patriots Energy Group and)
Universal Ensco, Inc.,)

Defendants.)

**ANSWERS TO LOCAL
RULE 26.01 INTERROGATORIES**

C.A. No.: 0:11-cv-02166-MBS

COMES NOW defendant Patriots Energy Group ("PEG") and responds to Local Civil Rule 26.01 DSC Interrogatories.

A. *State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.*

Answer: No person or entity has a subrogation interest in any of PEG's claims in this action.

B. *As to each claim, state whether it should be tried jury or nonjury and why.*

Answer: All causes of action set forth in the Complaint as against PEG are legal causes of action to which PEG is entitled to a trial by jury.

C. *State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.*

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Answer: PEG is not a publicly owned company. PEG is not the parent, subsidiary, partner or affiliate of any publicly owned company. No publicly owned company owns ten percent or more of PEG, and PEG does not own ten percent or more of the outstanding shares of any publicly owned company.

D. *State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).*

Answer: PEG is not challenging the filing of this case in the Rock Hill Division.

E. *Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.*

Answer: No.

F. *If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.*

Answer: PEG is properly identified.

G. *If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.*

Answer: Although PEG may make such a contention at the future date, at this junction PEG is not asserting that any other person or legal entity is liable to it.

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Rock Hill, S.C.

Date: October 28, 2011

Respectfully submitted,

SPENCER & SPENCER, P.A.

By: /s/ W. Mark White

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